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STEFAN C. PASSANTINO 202.496.7138 spassantino@mckennalong.com

BENJAMIN P. KEANE 202.496.7672 bkeane@mckennalong.com

December 18, 2014

### VIA HAND DELIVERY AND E-MAIL

Federal Election Commission
Office of Complaints Examination and Legal Administration
Attn: Frankie Hampton, Paralegal
999 E Street, NW
Washington, DC 20436
fhampton@fec.gov

Re: MUR 6894 – Steve Russell for Congress, and Mr. David Lee Tinker, in His Official Capacity as Treasurer of Steve Russell for Congress

Dear Ms. Hampton:

Please accept the following Response filed on behalf of Steve Russell for Congress and Mr. David Lee Tinker (in his capacity as Treasurer of Steve Russell for Congress) with respect to MUR 6894 — the Complaint submitted to the Federal Election Commission ("FEC" or the "Commission") on October 24, 2014 by Mr. Wallace Collins, Chairman of the Oklahoma Democratic Party. For the reasons set forth in the Response, the Named Parties do hereby request that the Commission either dismiss MUR 6894 in its entirety or, alternatively, make an affirmative determination that there is "no reason to believe" any violations have occurred in connection with the present matter.

Thank you in advance for your time and consideration of this request. Should the FEC have any questions regarding the Response or require additional information concerning the arguments or information presented therein, please do not hesitate to contact us by phone or e-mail.

Sincerely,

Benjamin P. Keane

### Before the FEDERAL ELECTION COMMISSION

In the matter of:	)	
Steve Russell for Congress; and Mr. David Lee Tinker, in His Official Capacity as Treasurer of Steve Russell for Congress	) ) ) )	MUR No. 6894

# RESPONSE OF STEVE RUSSELL FOR CONGRESS AND MR. DAVID LEE TINKER. IN HIS OFFICIAL CAPACITY AS TREASURER OF STEVE RUSSELL FOR CONGRESS, TO COMPLAINT OF MR. WALLACE COLLINS

The following response ("Response") is submitted on behalf of Steve Russell for Congress ("SRC") and Mr. David Lee Tinker, in his official capacity as Treasurer of Steve Russell for Congress (collectively, "Respondents" or the "Named Parties") with respect to the complaint (MUR No. 6894; the "Complaint") filed by Mr. Wallace Collins ("Complainant"). As discussed in further detail within this Response, the Complaint authored by Mr. Wallace Collins¹ against the Named Parties has no basis in law. Rather, it amounts to nothing more than a conveniently-timed, politically-motivated attack, which was designed solely to drain the time and resources of the Named Parties, and to generate negative media coverage of Mr. Steve Russell in the weeks leading up to the November general election in Oklahoma's Fifth Congressional District race. Based wholly on circumstantial evidence, the Complainant accuses Respondents of violating the Federal Election Campaign Act of 1971 (the "Act") and asks the Federal Election Commission ("FEC" or the "Commission") to investigate and pursue an enforcement action against the Named Parties. Given the baseless nature of the instant

<sup>&</sup>lt;sup>1</sup> Mr. Collins is the current Chairman of the Oklahoma Democratic Party, which nominated and politically supported Mr. Steve Russell's chief opponent (Mr. Al McCaffrey) in the 2014 Oklahoma Fifth Congressional District general election.

Complaint, the Commission should reject Complainant's request and move to dismiss the present matter under review against Respondents.

### I. Introduction

Respondent SRC is the principal federal campaign committee of Mr. Steve Russell, Republican Member-Elect to the United States House of Representatives in Oklahoma's Fifth Congressional District. Complainant, unsurprisingly, is the current Chairman of the Oklahoma Democratic Party and an ardent political supporter of Mr. Russell's then-chief electoral opponent during the 2014 election. In the midst of a heated battle for Oklahoma's open Fifth District seat and approximately ten days before the November 4, 2014 general election, Complainant filed the present Complaint with the Commission alleging that the Named Parties violated various provisions of the Act and its associated regulations by "failing to disclose" certain television advertising purchases on SRC's pre-general campaign disclosure report. (Complaint, pg. 1). This act, the Complainant alleges, was a "gross violation" of federal campaign finance law and a denial of the voters' "right to know how much ... [was] spent on television during this crucial campaign period." (Complaint, pg. 1). From the timing of the submission, the lack of substantiation for its allegations, and the degree to which the Complaint was actively promoted in the news media<sup>2</sup> by Mr. Collins and other individuals affiliated with the Oklahoma Democratic Party, one can only conclude that this action was filed as a political ploy designed to embarrass Mr. Russell's campaign in the weeks before the general election rather than as a means through which to redress actual violations of the Act.

<sup>&</sup>lt;sup>2</sup> During the 2014 election, the Oklahoma Democratic Party issued a press release with great fanfare touting the Complaint against SRC. Copies of the Oklahoma Democratic Party press release – publicly referenced by third parties on Facebook – are attached hereto as Exhibit #1. As further proof that the Complaint was considered even by the Oklahoma Democratic Party as nothing more than an election-season political gambit, however, the Oklahoma Democratic Party appears to have removed the press release from its own website and archives.

Even a cursory review of Complainant's allegations compels one to reach the conclusion that the Complaint is wholly without merit. Its contents assert that the Named Parties committed "violation[s] of the Federal Election Campaign Act's disclosure requirements" by failing to report at least \$20,000 in television advertising slots allegedly purchased on behalf of SRC from a local television station in Oklahoma City, Oklahoma. (Complaint, pg. 1). Specifically, the Complaint contends that the 2014 pre-general election disclosure report (FEC-968179) SRC filed with the Federal Election Commission ("FEC" or the "Commission") failed to identify as either campaign debt or campaign expenditures at least \$20,000 in television advertising purchased by an intermediary (Thompson Communications Inc.) on behalf of SRC. These claims, however, are based entirely on unfounded assumptions and an erroneous understanding of federal campaign finance law. As such, there is no compelling justification for Complainant's assertions or reasonable foundation for asking the Commission to pursue an investigation against Respondents.

As is demonstrated fully below, the claims advanced by Complainant against the Named Parties are unsupported by the Act. At no time since the establishment of SRC has the campaign committed any gross violations of law by failing to meet its disclosure obligations with the FEC. Likewise, at no time since the establishment of SRC have Respondents sought to deceive voters or deny them access to public information regarding the committee's spending on advertising during the 2014 campaign. To these points, the Named Parties have taken all relevant and necessary precautions to ensure that each of SRC's campaign disclosure filings comply with the Act, FEC regulations, and relevant Commission advisory opinions. As such, any assertions that SRC failed to meet its campaign finance reporting obligations or sought to avoid disclosing committee expenditures are altogether inaccurate. Consequently, there is no foundation upon

which to initiate an investigation of the Named Parties and their activities, nor is there any reason to conclude that the Act, its implementing regulations, or any other laws have been violated.

### II. Argument

Steve Russell for Congress Was Not Obligated to Report the Identified Television Advertising Expenses Incurred by Thompson Communications Inc. As Either Campaign Debt or Campaign Expenditures on the Committee's 2014 Pre-General Disclosure.

The present Complaint asserts that Respondents failed to meet their public disclosure obligations under the Act and its associated rules and regulations by not reporting "at least \$20,000 in television advertis[ements]" on SRC's 2014 pre-general election disclosure report to the FEC, which were purportedly purchased by Thompson Communications (hereinafter "TC") on behalf of the campaign committee. Essentially, Complainant believes that SRC failed in its obligation to report these television advertising purchases by TC as either committee disbursements or campaign debt. To support these misguided contentions, Complainant provides the Commission with a collection of invoice and certification documents indicating that TC contracted to purchase television air time on or around October 14, 2014 to run advertisements on behalf of Mr. Russell in the Oklahoma City, OK media market. (See Complaint, pg. 3-12). None of these pieces of "factual support" for Complainant's claims provide any legal or factual basis for the FEC to believe that SRC failed to meet its disclosure obligations under the Act or its associated regulations. Nevertheless, Respondents will endeavor to address the Complaint's allegations below in order to highlight its misguided interpretation of federal campaign finance law. Based upon the facts and arguments set forth herein, it should be clear to the Commission that the Named Parties are in full compliance with federal campaign disclosure requirements, and that the assertions made by Mr. Collins in the Complaint are wholly without merit.

Under federal campaign finance law, the principal campaign committee of a candidate for federal office is required to report all receipts and disbursements in accordance with 2 U.S.C. & 434(b)(4) and 11 C.F.R. § 104.9. As part of this obligation, a campaign committee must itemize certain purchases or payments it makes in accordance with the standards set forth in 11 C.F.R. § 104.3(b)(4). Under the tenets of this regulation, a campaign committee must itemize all disbursements that qualify as transfers, loan repayments, and contributions to other federal candidates regardless of the amount of money disbursed. 11 C.F.R. § 104.3(b)(4)(ii), (iii) and By comparison, all other campaign committee disbursements (including operating (v). expenditures) need only be itemized when they exceed \$200 or aggregate over \$200 when added to other disbursements (within the same category) made to the same payee during a particular election cycle. 11 C.F.R. § 104.3(b)(4)(i) and (vi). For the purposes of public disclosure, expenditures that meet the above monetary threshold or that fall into the aforementioned, enumerated categories must be disclosed in an itemized fashion on a committee's FEC disclosure report. Proper itemized disclosure requires the provision of clear and accurate information regarding the name and address of the payee and the purpose, category, date and amount of the disbursement. 11 C.F.R. § 104.3(b)(4) and 104.9. This, however, is the limit of disbursement disclosure required by federal law. Candidate committees, despite what Mr. Collins' and his political allies might hope, are not required to "sub-itemize" the standard spending of its campaign vendors on FEC disclosures.<sup>3</sup> Such outlays are, by definition, not disbursements of the campaign committee, and therefore not reportable under the Act and its associated regulations.

<sup>&</sup>lt;sup>3</sup> The "expenditures" at issue in the present matter involve payments made by commercial vendors of authorized committees in the course of interactions with various commercial sub-vendors. The legal standards governing the disclosure of such vendor outlays to sub-vendors is separate and apart from the standards associated with the disclosure of personal advances by campaign staff or campaign credit card payments, which do require some degree of sub-vendor itemization under existing Commission rules and interpretative policies. See FEC Interpretive Rule on Reporting Ultimate Payees of Certain Political Committee Disbursements.

In the disclosure context, federal campaign finance law also requires campaign committees to report certain types of organizational debts and obligations incurred.<sup>4</sup> Under 11 C.F.R. §§ 104.3(d), 104.11 and 116.6(c), a committee is required to report debts of \$500 or less on its FEC disclosures once such obligations have been outstanding for 60 days or more from the date of the transaction at issue. According to FEC guidance, such small debts should be reported on the next regularly scheduled disclosure report filed by the campaign committee. In the context of larger debts exceeding \$500, FEC regulations compel a campaign committee to disclose the debt on the public report covering the date on which the obligation is incurred. When itemizing campaign debts or obligations under the above standards, a committee is required to report the following: the outstanding amount owed on the debt or obligation; any payments made to reduce the debt or obligation; the complete name and address of the creditor; and a clear and accurate description of the purpose and nature of the debt or obligation. This, however, is the limit of debt disclosure required by the Act and its associated regulations. Candidate committees are not required to "sub-itemize" debts or contractual obligations incurred by their third-party commercial vendors on FEC disclosures.<sup>5</sup> Such financial obligations incurred by commercial vendors are, by definition, not direct debts of the campaign committee, and therefore fall outside of the Act's debt disclosure framework for authorized committees.

<sup>&</sup>lt;sup>4</sup> Certain regularly-recurring obligations and administrative expenses (such as rent payments, utility bills, and employee salaries) are expressly exempted from public debt disclosure until such time as they are considered past due by the committee.

The "debts" at issue in the present matter involve obligations incurred by commercial vendors of authorized committees in the course of interactions with various commercial sub-vendors. The legal standards governing the disclosure of such vendor obligations to sub-vendors is separate and apart from the standards associated with the disclosure of personal advances by campaign staff or campaign credit card debts, which do require some degree of sub-vendor itemization under existing Commission rules and interpretative policies. See FEC Interpretive Rule on Reporting Ultimate Payees of Certain Political Committee Disbursements.

In light of the above legal standards for disbursement and debt disclosure, there is no legitimate reason for the Commission to believe that Respondents failed to meet their disclosure obligations under the Act or its associated regulations. The Complainant, however, asserts that the Commission should initiate an investigation into the reporting activities of the Named Parties because SRC failed to publicly report the costs associated with outside advertising expenditures incurred by one of its third-party media vendors (TC) during the pre-general election disclosure window (October 1 through October 15, 2014). In support of his investigative request, Complainant provides absolutely no direct evidence of unreported expenditures or debts incurred by SRC during the pre-general reporting period. Rather, he asks the Commission to consider two separate television contracts entered into by TC during the relevant disclosure period as "evidence" of potential wrongdoing by the Named Parties. Those third-party contracts, Mr. Collins alleges, reflect actual or prospective monetary outlays on behalf of SRC that should have been disclosed to the voting public. This is wholly erroneous, as a brief review of the contracts at issue bears out.

The contractual agreements at issue in the present matter were entered into by TC on October 14, 2014 and October 15, 2015 for the purpose of purchasing television air time on two separate television stations in Oklahoma City, OK – KOCO and KFOR. Such air time was purchased, as can be gathered from the publicly-available contracts furnished by each station, in order to secure specific opportunities for TC to air political advertisements it developed in support of Mr. Russell's candidacy for the U.S. House of Representatives. The KOCO contract indicates that 60 advertising spots were secured by TC for the gross amount of \$10,725.00 (\$9,116.25 after advertising agency commission). (Complaint, pg. 5). By comparison, the KFOR contract indicates that 43 advertising spots were secured by TC for the gross amount of

\$10,025.00 (\$8,521.25 after advertising agency commission). (Complaint, pg. 7). SRC was not, however, a party to either agreement. As such, it is readily apparent that the campaign committee had no direct financial responsibility for any portion of the \$20,750.00 in gross (or \$17,637.50 in net) fees owed to KOCO and KFOR. Likewise, given the nature of both the KOCO and KFOR agreements, it is clear that SRC did not directly disburse any funds, or incur any direct committee debts or obligations, to either television station in association with the purchase of the 103 at-issue advertising time slots. TC, and TC alone, bore the burden of the discussed financial obligations under the KOCO and KFOR television contracts.

Since SRC made no direct monetary outlays and incurred no financial liabilities in association with the KOCO and KFOR agreements, the campaign had no reportable "disbursements" or "debts" to record on its 2014 pre-general election disclosure. Complainant, however, disagrees. Mr. Collins asserts that the Named Parties had an affirmative obligation to disclose the itemized amounts of the TC contracts as either direct expenditures by or direct debts of SRC. Such an approach to disclosure by federal candidates is not required by the Act and its associated regulations. Federal campaign finance law simply does not require authorized committees to disclose sub-vendor payments or obligations incurred by third-party campaign vendors simply because such outlays are made for the benefit of the campaign. When a third-party vendor is acting in a paid capacity under the terms of a specified contract or other work agreement with an authorized committee, the Act and its associated regulations do not obligate the vendor to sub-itemize all of the disbursements it undertook to accomplish the underlying campaign task it was hired to complete.

For example, when an authorized committee hires a third-party polling vendor to conduct polling on behalf of a campaign, the committee is not responsible for disclosing how much the

vendor pays any particular sub-vendor for telephone costs, internet fees, overhead expenditures, or personal contact lists. Similarly, when an authorized committee hires a third-party transportation company to be its campaign bus vendor, the committee is not responsible for reporting how much the vendor pays any particular sub-vendor for gas, bus maintenance, tolls, or driver salaries. The same disclosure framework is applicable in the media vendor context, When an authorized committee contracts with a third-party media company to produce and distribute television or internet advertising for a campaign, the committee is not obligated to disclose on its FEC reports how much the media vendor pays camera crews, film production companies, film editors, actors, television stations, or other similar sub-vendors. Despite the hopes of various "transparency-advocacy" groups and other activist parties, such burdensome sub-vendor disclosure is simply not required by federal law. The Act and its associated regulations (as set forth earlier in this response) only require a campaign committee to accurately disclose the direct monetary outlays it makes to, or obligations it incurs with, first-level vendors for the provision of campaign services. Any additional disclosure beyond this first-level of vendor is not compelled by statute or regulation, and is not required for a committee to be considered in compliance with federal campaign finance law.

Given the above legal framework, SRC was under no affirmative duty in its 2014 pregeneral election disclosure report to reference any of the \$20,750.00 in gross (or \$17,637.50 in net) sub-vendor fees incurred by TC in association with the KOCO and KFOR contracts. Although the financial obligations associated with both agreements occurred during the pregeneral election reporting window (October 14, 2014 and October 15, 2014 respectively), the assessed fees were obligations incurred by an outside commercial vendor in relation to two separate commercial sub-vendors. As such, the potential outlays fell outside of the scope of the

Act's disclosure regime for authorized committees and were not required to be disclosed by SRC as itemized campaign disbursements or debts. In light of this fact, it is patently false for the Complainant to assert that SRC somehow failed in its federal campaign finance reporting obligations regarding TC. Although SRC is not required to and does not endeavor to report subvendor payments made by TC when providing media services to the campaign, the committee is extremely careful to ensure that any direct outlays, or financial obligations, it makes to TC in connection with media services are fully disclosed in accordance with the Act.

Evidence of SRC's full compliance with the reporting requirements of federal law governing the disclosure and itemization of campaign disbursements and debts associated with third-party vendors can be found throughout the committee's past periodic filings with the Commission. In the specific context of TC (as an outside vendor), SRC's public filings clearly provide detailed information regarding the purpose, category, date and amount of all payments (in excess of \$200 in the aggregate) the campaign committee has made for the development and distribution of television media. For example, in SRC's most-recent public disclosure, the committee reported two separate payments it made to TC for the production and dissemination of television media advertising: (1) a \$47,665.00 payment it made to TC on October 20, 2014; and (2) a \$123,285.00 payment it made to TC on November 1, 2014. See Exhibit #2 (attached hereto). Likewise, in the committee's October 2014 quarterly disclosure with the Commission, SRC reported multiple payments it made to TC for the development and broadcasting of television media – (1) a \$36,306.00 payment it made to TC on August 19, 2014; (2) a \$48,015.00 payment it made to TC on August 25, 2014; and (3) a \$41,973.00 payment it made to TC on September 3, 2014. See Exhibit #3 (attached hereto). Along the same lines, SRC has also

reported analogous disbursements to TC as a third-party media vendor in its 2014 July quarterly disclosure report<sup>6</sup> and its 2014 pre-primary runoff disclosure report<sup>7</sup> with the Commission.

In light of this series of itemized disclosures, it should be readily apparent to the Commission that SRC has fully met its statutory and regulatory obligations to report certain campaign disbursements and financial commitments to TC as an outside media vendor. Over the course of its existence as an authorized committee, SRC has dutifully disclosed the precise amounts it has paid to TC for the media and advertising services it has provided the campaign. Those amounts, as required by law, have been reported on the appropriate FEC disclosure report based upon the corresponding time the payment was made by SRC. In the lone instance where SRC was unable to meet its payment obligation by the billing date set by TC, the value of the media services rendered by the vendor were disclosed as a campaign debt on the committee's 2014 July quarterly report.<sup>8</sup> This debt, which was paid in full during the following disclosure period, was then properly reported as both a disbursement and repaid obligation on SRC's 2014 pre-primary runoff disclosure report.<sup>9</sup> This modus operandi for disclosing disbursements and debt associated with SRC's use of TC as an outside media vendor continues at present, and is in full compliance with federal campaign finance law.

Given the legal and factual conclusions set forth above, it is abundantly clear that the allegations contained in the Complaint have no evidentiary foundation and provide no basis for further Commission investigation. In turn, Respondents believe that the FEC should summarily dismiss the claims raised by the Complainant and find that SRC has been in full compliance with

<sup>&</sup>lt;sup>6</sup> See Exhibit #4 attached hereto.

<sup>&</sup>lt;sup>7</sup> See Exhibit #5 attached hereto.

<sup>8</sup> See Exhibit #6 attached hereto.

<sup>&</sup>lt;sup>9</sup> See Exhibit #7 attached hereto.

the public reporting requirements of federal campaign finance law. In the unlikely event, however, that the FEC staff wishes to inquire further about the specific nature of SRC's disbursement and debt disclosure practices, the Named Parties remain committed to full cooperation and undertaking their "best efforts" to ensure absolute compliance with federal law. As such, the SRC would be willing and able to make technical or conforming amendments to its existing public disclosures in order to assuage any concerns raised by the Commission. <sup>10</sup>

### III. Conclusion

As the information contained within this Response clearly sets forth, Respondents have done nothing to run afoul of the legal requirements of the Act, Commission regulations, or relevant FEC advisory opinions. To the contrary, it is quite apparent that the Named Parties have taken great pains to ensure that they are in full compliance with federal campaign finance law. Despite this fact, however, Complainant has seen fit to make unsubstantiated allegations and present ineffectual "evidence" against Respondents, presumably for the purpose of political advantage in the midst of a heated general election campaign. As a result of these actions and the meritless nature of Mr. Collins' claims, the Commission should summarily dismiss the Complaint against the Named Parties and find that there is no reason to believe that Respondents have violated the Act or its associated rules and regulations.

<sup>&</sup>lt;sup>10</sup> SRC's willingness to consider suggested revisions to its present FEC disclosure reports should in no way be considered as an admission of non-compliance with existing legal requirements.

Respectfully Submitted,

Stefan C. Passantino & Benjamin P. Keane

McKenna Long & Aldridge LLP

1900 K Street, NW

Washington, DC 20006

Telephone: (202) 496-7138; (202) 496-7872

Fax: (202) 496-7756

Designated Counsel for Steve Russell for Congress and Mr. David Lee Tinker, in His Official Capacity as Treasurer of Steve Russell for Congress

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John David Stinson ELECT A VET

November 3 · Oktahoma City, OX ·

FOR IMMEDIATE RELEASE

October 30, 2014

FEC RECEIVES COMPLAINT ABOUT STEVE RUSSELL

Complaint cites failure to disclose purchase of television ads...

"Russell's deliberate failure to disclose violates numerous laws and constitutes illegal contributions to his campaign."

Oklahoma City - Federal Election Commission (FEC) staff confirmed to the Oklahoma Democratic Party today that the FEC Office of General Counsel has received a complaint about the Republican nominee in the 5th Congressional District, Steve Russell.

The complaint lays out evidence that Steve Russell purchased television advertising with KOCO and falled to disclose that purchase on a pre-general report filed October 23, 2014.

"Republicans have gotten in the habit of not following the rules here in Oklahoma where they control enforcement. But the FEC doesn't play around with this kind of negligence" said Trav Robertson, Executive Director of the Oklahoma Democratic Party.

Robertson continued, "Steve Russell not only lives outside the 5th Congressional District, Russell dodges debates like he did last night. He purposely misled the voters and the FEC will prove it. I guess he is so busy campaigning in Montana, New York and Indiana that he simply doesn't care about being honest with Oklahoma,\*

To download a copy of the FEC complaint click here.

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John David Stinson nber 3 at 5:38pm

FOR IMMEDIATE RELEASE October 30, 2014 FEC RECEIVES COMPLAINT ABOUT STEVE RUSSELL Complaint cites failure to disclose purchase of television ads..."Russell's deliberate failure to disclose violates numerous laws and constitutes disclose violates numerous laws and constitutes lilegal contributions to his campaign." Oldahoma City – Federal Election Commission (FEC) staff confirmed to the Oldahoma Democratic Party today that the FEC Office of General Counsel has received a complaint about the Republican nominee in the 5th Congressional Olstrict, Steve Russell. The complaint lays out evidence that Steve Russell purchased television advertising with KOCO and purchased belevision advertising with KOCD and falled to disclose that purchase on a pre-general report filed October 23, 2014. Republicans have gotten in the habit of not following the rules here in Oklahoma where they control enforcement. But the FEC doesn't play around with this lind of negligence' said Tray Robertson, Executive Director of the Oklahoma Democratic Party. Robertson continued, "Steve Russell not only lives outside the 5th Congressional District, Russell dodges debates like he did last right. He purposely misled the woters and the FEC will prove it. 2 guess he is so busy campaligning in Montana, New York and Indiana that he simply doesn't care about being honest with Circlahoma. To rinventure a rown of the \_\_



Steve Russell for Congress

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John David Stinson ELECT A VET

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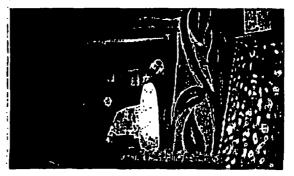


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FEC RECZIVES COMPLAINT ABOUT STEVE RUSSELL

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great Thanksgiving, Madison Rising: Music With Meaning.





ELECT A VET shared Bill Cassidy's video.

! When it comes to Obama's falled policies, Mary Landrieu is always saying, "Yes You Can!" Watch this video to learn more.



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FEC FORM 3

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	Candidate Name				Category/	,   Transa	ction (C	) : B	84848	:E42	7444861	DYUF	•
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3.	Thompson	Communication	ns				of Disb					_	
	Mailing Address	PO Box 5				⊣ ՝ <u>"</u>	, j'ii	, 2	n	٧	2014	٧	
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	Media buy  Candidate Name				أستوميه إرباعا		ction ID		-		-		**
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						erson for the purpose of soliciting contributions to solicit contributions from such committee.
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<u></u>	Full Name (Last, Fi	rst, Middle Initial)	· · · · · · · · · · · · · · · · · · ·			
A.	Bancfirst				<del> </del>	Date of Disbursement
	Mailing Address 93	35 S Penn Ave				10 31 2014
	City Oklahoma City		State OK	Zip Code 73159-6913	_	Amount of Each Disbursement this Period
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	Candidate Name				Category/ Type	
	Office Sought:	House Senate President	Disbursement For Primary Other (s	General		
		District:				
В.	·					Date of Disbursement
	Mailing Address PO Box 5					11 03 2014
	City Marshfield		State MO	Zip Code 65706-0005		Amount of Each Disbursement this Period
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_		District:	<u> </u>			
C.	Full Name (Last, Fir Bancfirst	st, Middle Initial)				Date of Disbursement
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SUBTOTAL of Disbursements This Page (optional).....

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PAGE 1 / 85

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FEC FORM 3	AND DI	T OF RE SBURSE Authorized Con	MENTS	Office	se Use Only
1. NAME OF COMMITTEE (In	TYPE OR PRII full)		xample: If typing, type ver the lines.	12FE4M5	,
Steve Russell	for Congress		111111	11111	
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4. TYPE OF RE	PORT (Choose One)	(b) 12-Day PRI	E-Election Report for the	proj	Runoff (12R)
April 15	Quarterly Report (Q1)		Primary (12P)  Convention (12C)	General (12G)  Special (12S)	' Runoff (12R)
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ب	31 Year-End Report (YE)		3T-Election Report for ti	he:	Oldio Of Salas
•			General (30G)	Runoff (30R)	Special (30S)
Termina	tion Report (TER)	Election on		A Company of the Comp	In the State of
5. Covering Period	N M / 07	2014	through £ 0		2014
certify that I have ex	xamined this Report and to	o the best of my ki	nowledge and belief it is	true, correct and com	aplete.
Type or Print Name of	of Treasurer David Tinker	·		patro trans	1 mar. 1 mar.
Signature of Treasure	David Tinker		[Electronically Filed]	Date	24 2014
NOTE: Submission of t	alse, erroneous, or incomple	ete information may	subject the person signin	ng this Report to the per	nalities of 2 U.S.C. §437g.
Office Use Only					EC FORM 3 Revised 02/2003)

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SCHEDULE B (FEC Form 3)		FOR LINE NUMBER: PAGE 64 OF 85				
· · · · · · · · · · · · · · · · · · ·	Use separate schedule(s)	(check only one)				
ITEMIZED DISBURSEMENTS	for each category of the Detailed Summary Page	🔀 17 🔲 18 🔲 19a 🔲 19b				
	Detailed Curimary rage	20a 20b 20c 21				
Any information copied from such Reports and Statements ma	y not be sold or used by any	person for the purpose of soliciting contributions				
or for commercial purposes, other than using the name and a	ddress of any political commit	tee to solicit contributions from such committee.				
NAME OF COMMITTEE (In Full)	<del></del>					
Steve Russell for Congress						
dieve itussell for congress						
Full Name (Last, First, Middle Initial)	······································					
A. Metropolitan Library		Date of Disbursement				
A. Metropolitan Library		TWITTE TO TOT A TOTAL VALVE				
Mailing Address 10 S Boulevard St						
Maintil Vocass 10 2 BodisAsin 21		08 19 2014				
City State	Zip Code	Amount of Each District and this Boded				
Edmond OK	73034-3770	Amount of Each Disbursement this Period				
Purpose of Disbursement	h	280.00				
Room rental for town hall	1 7	Anna Canada and an				
Candidate Name	· · · · · · · ·	Transaction ID : B3DD1E7CC23E047C982A				
Canadate Name	Category/ Type					
Office Sought: House Disbursement For:		<del></del>				
	General	}				
Senate Primary						
	ecify) Runoff2014					
State: District:	<del></del>	<del></del>				
Full Name (Last, First, Middle Initial)						
B. Victory Phones		Date of Disbursement				
Matting Address	M M / O O / Y Y Y					
Mailing Address 190 Monroe Ave NW 5th Floor	08 19 2014					
City - State	City - State Zip Code					
	49503-2628	Amount of Each Disbursement this Period				
Grand Rapids MI Purpose of Disbursament	<del></del>	427.37				
Robocalling	Annual Control	Transaction ID: BA52F0BDE9A4F45E3A83				
	——————————————————————————————————————					
Candidate Name	Category/					
Office Sought: House Disbursement For:						
	General					
	1					
	ecify) Runoff2014					
State: District:	<del></del>					
Full Name (Last, First, Middle Initial)		Data of Billians				
c. Thompson Communications		Date of Disbursement				
		A W W A D O A A A A A A A A A A A A A A A A A				
Mailing Address PO Box 5		08 19 2014				
City State Zip	Codo	<del></del>				
	Code 706-0005	Amount of Each Disbursement this Period				
Marshfield MO 65 Purpose of Disbursament	<del></del>	36306.00				
Media buy	. * * * * * * * * * * * * * * * * * * *	1 m + 11 h 3 - 15 m - 15				
Condidate Name		Transaction ID : B1D24D9750723452792A				
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President Other (sp	General Bodity) Runoff2014	37.013.37.				
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ITEMIZED DISBURSEMENTS			for each categor Detailed Summa		X 17 18 19a 19b 20c 21		
					person for the purpose of soliciting contributions tee to solicit contributions from such committee.		
	NAME OF COMM Steve Russ	ITTEE (In Full) ell for Congress					
Full Name (Last, First, Middle Initial)  A. Hilton					Date of Disbursement		
	Mailing Address	1 Park Ave			08 25 2014		
	City Oklahoma City	State OK	Zip Code 73102-9003		Amount of Each Disbursement this Period		
	Purpose of Disbu Room rental for e	rsement Iveni		}	350.00 Transaction ID : 8508E42F8FF8746DE8EB		
	Candidate Name			Category/ Type	<del>-</del>		
	Office Sought:		_	4	7		
_	State: Full Name (Last, I	District: First, Middle Initial)					
8.	Thompson (	Communications	Date of Disbursement				
	Mailing Address	PO Box 5	08 25 2014				
	·City  Marshfield	State MO	Amount of Each Disbursement this Period				
	Purpose of Disbur		48015.00				
	Media buy  Candidate Name	<u> </u>		Category/	Transaction ID : B31CE839F91264A029A9		
	Office Sought:	House Disbursement Fo	or: 2014	Туре			
	Onico Godgini	Senate Primar		<b>,</b>			
_	State:	District:			<del></del>		
C.	Savannah J		•		Date of Disbursement		
	Mailing Address	902 Creston Way					
	City		Zip Code 73071-4912		Amount of Each Disbursement this Period		
	Purpose of Disbur Grassroots organ	sement		1	810.60		
Candidate Name				Category/ Type	Transaction ID : B482E4D0D3D74423E944		
	Office Sought:						
Г	State:	District:					
s	UBTOTAL of Disbu	ursements This Page (optional)			49175.60		
1	OTAL This Period	(last page this line number only)			par ancionéss (Bare - a grecour da moure.		

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS			Use separate schedule(s) for each category of the Detailed Summary Page		FOR LINE NUMBER: PAGE 71 OF 85 (check only one)    X   17		
	NAME OF COMM	inposes, other than u	ising the name and a			person for the purpose of soliciting contributions se to solicit contributions from such committee.	
Full Name (Last, First, Middle Initial)  A. Thompson Communications  Mailing Address PO Box 5						Date of Disbursement  M M / D / D / Y Y Y Y  O9 03 2014	
	City State Zip Code  Marshfield MO 65708-0005  Purpose of Disbursement Media buy  Candidate Name Category  Office Sought: House Disbursement For: 2014 Senate Primary General President Other (specify) Runoff2014					Amount of Each Disbursement this Period 41973.00 Transaction ID : BDDA04FE5868D418F89D	
В.	State: District: Full Name (Last, First, Middle Initial) Merche-Solutions  Mailing Address 740 St Maurice 4th Floor Quebec, Canada					Date of Disbursement	
City State Zip Co Montreal ZZ HC31L Purpose of Disbursement lees for processing contributions via credit card  Candidate Name			HC31L5	Category/	Amount of Each Disbursement this Period 979.05 Transaction ID: BD4347244272A418E85C		
•	Office Sought:	House Senate President District:	Disbursement For: Primary Other (sp	2014 General Decify) Runoff2014			
	Full Name (Last, First, Middle Initial)  Josh Wagoner  Malling Address 5348 E 81st St Apt 1227					Date of Disbursement	
Campaign staffer and expenses				Category/	Amount of Each Disbursement this Period 1000.00 Transaction ID: B685E845988E94DA0A01		
	Office Sought:	House Senate President District:	Olsbursement For: Primary Other (sp	General General	Туре		
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T	OTAL This Period	last page this line no	umber only)			and the second second	

PAGE 1 / 27

FORM S

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## REPORT OF RECEIPTS AND DISBURSEMENTS

FORM 3	For An Authorize	d Committee	.Office	e Use:Only
NAME OF TY COMMITTEE (in full)	PE OR PRINT Y	Example: If typing, type over the lines.	12FE4M5	
Steve Russell for Congre			<u> </u>	<u> </u>
<u> </u>	<del>                                     </del>	· · · · · · · · · · · · · · · · · · ·		
ADDRESS (number and street)	0600 S Penn Ave Ste 16	-284 		لببنين
Check if different than previously reported. (ACC)	Oklahoma City		OK 73170	0-4256
2. FEC IDENTIFICATION NUMI	BER ▼	тү 📤	STATE A	ZIP CODE
C C00558510	3. IS 1	THIS (1) NEW PORT (N) OR	AMENDED (A)	STATE V DISTRICT
4. TYPE OF REPORT (Choose (a) Quarterly Reports:  April 15 Quarterly Reports	rt (Qİ)	Day PRE-Election Report for the	General (12G)  Special (12S)	Runoff (12R)
July 15 Quarterly Repo	(00)	ction on in the second	V V V V V V	In the State of
January 31 Year-End R	aport (YE) (c) 30-0	Day POST-Election Report for th		
Termination Report (TE	·		Runoff (30R)	In the State of
5. Covering Period 06	05 l 2014			2014
I certify that I have examined this R Type or Print Name of Treasurer	aport and to the best of David Tinker	of my knowledge and belief it is	true, correct and corr	nplete.
Signature of Treasurer David Tin		[Electronically Filed]	Date 10	24 2014
NOTE: Submission of false, erroneous Office	or incomplete informati	ion may subject the person signing	g this Report to the per	naities of 2 U.S.C. §437g.
Use Only	[. ]			EC FORM 3 Revised 02/2003)

SCHEDULE B (FEC Form 3) ITEMIZED DISBURSEMENTS	Use separate schedule for each category of the Detailed Summary Pag	\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	PAGE 23 OF 27
Any Information copied from such Reports and Statements a or for commercial purposes, other than using the name and NAME OF COMMITTEE (In Full)  Steve Russell for Congress			
Full Name (Last, First, Middle Initial)  A. Homeland #274  Mailing Address 1630 SW 104th		Dete of Disbursemer	
City State Oklahoma City OK  Purpose of Disbursement gas/fuel  Candidate Name		e de lab de la lacidade de	67.00
State: District:			
Full Name-(Last, First; Middle Initial)  OH-K Fast Print  Mailing Address 4604 Dodge St		Date of Disbursement	P. L. Comp. September 1 and 100
City State Omaha NE Purpose of Disbursement Debt Repayment: Printing of Invitations to fundralser event Candidate Name		- young	225.79
Office Sought: House Senate Primary Other (s	General		
Full Name (Last, First, Middle Initial)  Thompson Communications  Malling Address PO Box 5	Date of Disbursemen	2014	
••	C 2014 General	Amount of Each Disb	33286.70
State: District: .  SUBTOTAL of Disbursements This Page (optional)	· · · · · · · · · · · · · · · · · · ·	•	93579.49

PAGE 1 / 61

FORM 3

### **REPORT OF RECEIPTS** AND DISBURSEMENTS

	For	An Author	nzea Com	mittee	<u> </u>		Office Use Only
1. NAME OF COMMITTEE (in	TYPE OR full)	PRINT' 🔻		ample: If typi er the lines.	ng, type	12FE4M	15
Steve Russell	for Congress		سلسلسا	<del></del>		<u> </u>	
<u>Liairra</u>	<u>, , , , , , , , , , , , , , , , , , , </u>		1.1.1.1.1.1	1 1 1 1 1 1	<u> </u>		المنتنانين
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2. FEC IDENTIFIC	CATION NUMBER <b>V</b>		ĈſŢŶ <sup>▲</sup>			STATE .	ZIP CODE A
	annigarine panas promis joera sp	•	io Tulo	eri Nes	ui	Santa Andreas	STATE ▼ DISTRICT
(C) C0055851	O garanta and san		IS THIS REPORT	(NEV	OR	AMEN (A)	OK 05
4. TYPE OF RE	PORT (Choose One)	1					
(a) Quarterly R		(p)	-	-Election Rep	•	Na. No. of	2
			بومانيد. با أرسيش	Primary (12)	<b>"</b> )	General	(12G) X Runoff (12R)
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	Quarterly Report (Q2)			Mark Same		and the second of the	en de la companya de
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5. Covering Period	07 01		014	through	08:	06	2014
certify that I have e.	xamined this Report a	nd to the be	st of my kn	owledge and	belief it is t	rue, correct an	d complete.
Type or Print Name o	of Treasurer David Ti	nker			- 7P · · · · · ·	,	
Signature of Treasure	t David Tinker			Electronically	<b>Filedj</b> (	Date 10	24 2014
JOTE: Submission of	false armneous or loca	omniete infor	mation may 4	whier the re-	Ron signing	this Report to	the penalties of 2 U.S.C. §437g.
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Any information co	pled from such Reports and Statements r	nav not be sold or	used by any	person for		 nose				hutio	_
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	President Other (s			Ì							
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1. NAME OF COMMITTEE (In	full)	TYPE OR	PRINT ¥		kample; If typi ver the lines.	ng, type	12FE4M	5
Steve Russell		ngress	<del></del>	<del>                                      </del>	<del>                                     </del>	1111	<del></del>	
ADDRESS (number ar	nd street)	10600 S	Penn Ave S	te 16-284	<del>                                     </del>			
Check if dit than previous reported. (A	usly	Oklahor	na City		<del></del>	—— ——	OK	73170-4258
2. FEC IDENTIFIC	CATION	NUMBER <b>V</b>	,	CITY A			STATE A	ZIP CODE
C C005585	•	The second	3.	IS THIS REPORT	i (N)	OR	AMENI (A)	DED OK 05
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i		End Report (			ST-Election Re	·	Runoff (3	<u> </u>
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certify that I have e				pest of my ki	nowledge and	belief it is tr	ue, correct and	d complete.
Signature of Treasure	or <u>D</u> e	svid Tinker			[Electronically	Filedj [	Date	24 2014
	false, erro	neous, or inc	omplete info	ormation may	subject the per	rson signing t	his Report to t	he penalities of 2 U.S.C. §437g.
Office Use Only								FEC FORM 3 (Revised 02/2003)

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	TS AND OBLIGATIONS			schedu		FOR LINE NUMBER:
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	iding Loans		j	numbered	o line)	X 10
1	E OF COMMITTEE (In Full)			•		
	eve Russell for Con		<u> </u>			
A	. Full Name (Last, First, Middle Initial) of Deb	tor or Creditor		i i		bt (Purpose): nt balloons
-	McIntyre Law			) Pi	inially liigi	it pancons
<u></u>	ailing Address 8601 S Western					
-  '''	BOOT 3 Western					
ि	ity State	Zip Code				
Lo	Oklahoma City	OK	73139-9200			
	Outstanding Balance Beginning This Period			Tr	ansactio	n ID : D87E1D327002D4539939
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8.	. Full Name (Last, First, Middle Initial) of Debte	or or Creditor				bt (Purpose):
	Thompson Communications			Ме	dia buy	
М	ailing Address PO Box 5					
C	ity State	Zip Code	<del></del>			
М	larshfield	MO	65706-0005			
	Outstanding Balance Beginning This Period	•		Tri	ansaction	n ID : DBA7C25FC8225417E9AC
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<u> </u>	Full Name (Last, First, Middle Initial) of Deb	tor or Creditor	<del></del>	Nati	re of Del	bt (Purpose):
٦	Singularis Group LLC	, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			mary win	
ı	Oliguians Croup LEO					
М	ailing Address PO Box 9265	•	,			
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<u>s</u>	hawnee Mission	KS	66201-1865	<u>.</u> .		
	Outstanding Balance Beginning This Period			Ti	ransactio	n ID.: DCCA8AFEB03B3480E935
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{	the age,	TOTAL TIMES		-		
					artement	
1) S	SUBTOTALS This Period This Page (optional)	*******		▶	دروه المعموليس	51443.10
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2) T	OTALS This Period (last page this line number	r only)			المستحددة	Service of the property of the service of the servi
3) Т	OTAL OUTSTANDING LOANS from Schedule	C (last page only).				A James Law South Company and the second company of the second com
4) A	DD 2) and 3) and carry forward to appropriat	e line of Summary I	Page (last page on	— ' · · · · · · · · · · · · · · · · · ·		

PAGE 1/61

# **REPORT OF RECEIPTS**

FEC FORM 3		SBURSEM Authorized Commi		Office	a Uso Only
NAME OF COMMITTEE (in full)	TYPE OR PRI		ple: if typing, type the ilnes.	12FE4M5	
Steve Russell for Co	ongress		<u> </u>	<u> </u>	
سيستنسب	11111				لينيني
ADDRESS (number and street)		1 Ave Ste 16-284			
Chank If different					
than previously reported. (ACC)	Oklahoma Ci	ty 		OK 73170	-4256
2. FEC IDENTIFICATION	NUMBER V	CITY A		STATE A	ZIP CODE
parting and transporting one was used.  CE C00558510  To contain and transporting and another contains.	, r		NEW (N) OR	AMENDED (A)	STATE V DISTRICT
4. TYPE OF REPORT  (a) Quarterly Reports:  April 15 Quarter  July 15 Quarter	rly Report (Q1)	P	ection Report for the rimary (12P) onvention (12C)	General (12G) Special (12S)	Runoff (12R)
October 15 Qua	iy Report (Q2) arteriy Report (Q3)	Election on	08 ; 26	2014	in the OK State of
January 31 Yea	r-End Report (YE)	(c) 30-Day POST-E	lection Report for the	alm /	everb.
Ø£nů		G	eneral (30G)	Runoff (30R)	Special (30S)
Termination Rep	oort (TER)	Election on	M M / D D		In the State of
5. Covering Period	07 + 91	2014	through ( )	3 08	2014
I certify that I have examined Type or Print Name of Treas	•	<u>•</u>	edge and belief it is	true, correct and com	plete.
Signature of Treasurer	David Tinker	[El	ectronically Fliedj	Date 10	24 2014
NOTE: Submission of false, er	roneous, or incompl	ete information may sub	ect the person signin	g this Report to the pen	alties of 2 U.S.C. §437g.
Use Only					EC FORM 3 Revised 02/2003)

		(FEC Form SBURSEMEN	-	Use separate so for each categor Detailed Summa	y of the	FOR LINE NUMBER: PAGE 58 OF 61 (check only one)    X   17
Ar	NAME OF COMM	irposes, other than t	using the name and a	ay not be sold or address of any pol	used by any itical committe	person for the purpose of soliciting contributions see to solicit contributions from such committee.
A.		First, Middle Initial) Communicatio PO Box 5	ns			Date of Disbursement
	City Marshfield Purpose of Disbur	rsement	State MO	ŻIp Code 65708-0005	- (	Amount of Each Disbursement this Period 21309.25
	Debt Repayment: Candidate Name Office Sought:		Disbursement For:	General	Calegory/ Type	Transaction ID : B7DBF4A33498546C893E
в.	State: Full Name (Last, F	President District: First, Middle Initial)	Other (s	pecify)		Date of Disbursement
	Malling Address City		State.	Zip Code		Amount of Each Disbursement this Period
	Purpose of Disbur	sement			Category/ Type	The second secon
	Office Sought: State:	House Senate President District:	Disbursement For: Primery Other (sp	General		
Э.	Full Name (Last, F	First, Middle Initial)				Date of Disbursement
	Mailing Address  City		State Zip	. Code		Amount of Each Disbursement this Period
	Purpose of Disbur	sement			Category/ Type	Special and the confidence of the confidence of the special confidence
	Office Sought:	House Senate President District:	Olsbursement For: Primary Other (sp	General General		
SI	JBTOTAL of Disbu	rsements This Page	(optional)		······	21309.25
T	OTAL This Period (	last page this line n	umber only)			148766.19

SC	CHEDULE D (FEC Form 3)			(Use separa	ate	PAGE 60 OF 61
	BTS AND OBLIGATIONS			schedule(:	(s)	FOR LINE NUMBER:
	cluding Loans			numbered li		(check only one) 9
_	ME OF COMMITTEE (In Full)					
5	Steve Russell for Con	gress				
	A. Full Name (Last, First, Middle Initial) of Det	otor or Creditor		•	e of De ia buy	bt (Purpose):
	Thompson Communications			l Micon	ia ouy	
	Mailing Address PO Box 5	<del>-</del>				
	City State	Zlp Code				,
	Marshfield	МО	65706-0005			<u>-</u> ,
	Outstanding Balance Beginning This Period 21309.25			Tran	sactio	n ID : DBA7C25FC8225417E9AC
	Amount Incurred This Period	Paym	ent This Period	Outs	standing	Balance at Close of This Period
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	B. Full Name (Last, First, Middle Initial) of Debi	tor or Creditor			of Del	bt (Purpose):
	Singularis Group LLC			' ''''	21.y vv	501165
	Malling Address PO Box 9265					
	City State	Zip Code				
1	Shawnee Mission	KS	66201-1865			
	Outstanding Balance Beginning This Period			Trans	saction	n ID: DCCA8AFEB03B3480E935
	ا بستانستانستانستانستانستانستانستانستانستان	Paymo	ent This Period			Balance at Close of This Period
	0.00	والمستمول مساو مستواليس	0.0 and provide an formal provides and an extension of the contract of the con		handen Particular	3000.00
	C. Full Name (Last, First, Middle Initial) of Deb	ntor or Creditor	· · · · · · · · · · · · · · · · · · ·	Nature	of Del	bt (Purpose):
	Heartland Campaign Managem			Funda		consulting fee, postage & mileage
	Mailing Address 10312 S 177th St					
	City .	State	Zip Code			
	Omaha	NE	68136-1974	Tenn	nesetio	n IN - DADD04304A7474E60022
	Outstanding Balance Beginning This Period			I Fall	ISacuo	n ID : DADD81391A7174F58922
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1)	SUBTOTALS This Period This Page (optional).					33438.19
2)	TOTALS This Period (last page this line number	er only)		. <b>&gt;</b>		growing growing was a work
3)	TOTAL OUTSTANDING LOANS from Schedule	e C (last page only)		· • · · · · · · · · · · · · · · · · · ·	انبر مالسب. دامده ماسو	igina dan jigi sa sa sa sa sa sa sa sa sa sa sa sa sa
4)	ADD 2) and 3) and carry forward to appropria	te line of Summary	Page (last page only	ý) <b>Þ</b> ≟		والمستنسب فالمنطاء مه أنهمها إحديد

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